

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America )

v. )

) Case No. 15 MJ 6002 - MPK

URIEL ESTEBAN RAMIREZ-TAMAYO )

)

)

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 18, 2014 in the county of Middlesex in the  
District of Massachusetts, the defendant(s) violated:

*Code Section*

*Offense Description*

21USC 841(a)(1) Possession of Cocaine with Intent to Distribute

This criminal complaint is based on these facts:

See attached affidavit of Special Agent John A. Mercer, Jr.

Continued on the attached sheet.

*Complainant's signature*

John A. Mercer, Jr., ATF Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: \_\_\_\_\_

*Judge's signature*

City and state: \_\_\_\_\_ Boston, Ma.

Hon. M. Page Kelley, U.S.M.J.

*Printed name and title*

**AFFIDAVIT OF SPECIAL AGENT JOHN A. MERCER, JR.**

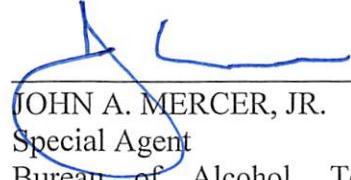
I, Special Agent John A. Mercer, Jr., depose and state as follows:

1. I am a Special Agent with the federal Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I have been an ATF Special Agent for approximately twenty-four years, and during that time I have been involved in numerous investigations of violations of federal firearm and controlled substance laws. Currently, I am assigned to a group in the Boston Field Division of the ATF that, in part, works with other federal, state, and local police departments in and around the City of Boston to investigate and prosecute violations of the federal firearms, explosives, and controlled substance laws.

2. Based on my training and experience as an ATF Special Agent, I know that it is a violation of 21 U.S.C. §841(a)(1) for a person to possess cocaine with the intent to distribute it. As set forth below, there is probable cause to believe that URIEL ESTEBAN RAMIREZ-TAMAYO violated 21 U.S.C. §841(a)(1) on or about December 18, 2014, by illegally possessing cocaine with the intent to distribute it.

3. On December 18, 2014, the ATF and local police officers executed a federal search warrant at an apartment in Malden associated with RAMIREZ-TAMAYO. Officers seized over 20 grams of cocaine along with several other items associated with the distribution of cocaine, including digital scales, packaging materials, cutting agents for cocaine, and a ledger. At the time of the execution of the search warrant, RAMIREZ-TAMAYO was present at the scene and detained. He was subsequently arrested by local officers. Following being advised of his *Miranda* rights, RAMIREZ-TAMAYO admitted that he had possessed cocaine with the intent to distribute it.

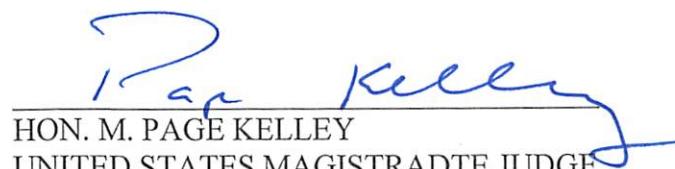
4. Based on the above, I believe probable cause exists that on or about December 18, 2014, within the District of Massachusetts, URIEL ESTEBAN RAMIREZ-TAMAYO, did possess cocaine with the intent to distribute it in violation of 21 U.S.C. §841(a)(1).

  
JOHN A. MERCER, JR.

Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn to before me this 30th day of January, 2015.

  
HON. M. PAGE KELLEY

UNITED STATES MAGISTRADTE JUDGE